



State of Ohio Environmental Protection Agency

**Southwest District Office**

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George V. Voinovich  
Governor

December 29, 1999

Mr. Johnny Reising  
U.S. Department of Energy, Fernald Area Office  
P.O. Box 538705  
Cincinnati, OH 45253-8705

**Re: OSDF BORROW AREA STRATEGY REPORT**

Dear Mr. Reising:

Ohio EPA has reviewed DOE's December 1, 1999 submittal "Transmittal of the Draft On-Site Disposal Facility Borrow Area Strategy Report." Ohio EPA's comments on the document are provided below:

- 1) Commenting Organization: Ohio EPA      Commentor: OFFO  
Section #: 3.2      Pg #: 3-2      Line #: 2-7      Code: c  
Comment: The Shrinkage/Bulking Factor being used is based on the estimates made before cell construction. With the information available from the construction of the first three cells, have any calculations been performed to confirm the continued use of this estimate? Please provide details.
- 2) Commenting Organization: Ohio EPA      Commentor: OFFO  
Section #: 4.1      Pg #: 4-1      Line #: 3      Code: E  
Comment: Insert "restoration" following "..interim.."
- 3) Commenting Organization: Ohio EPA      Commentor: OFFO  
Section #: 5      Pg #: 5-1      Line #: 12      Code: E  
Comment: Replace "very" with "vary."
- 4) Commenting Organization: Ohio EPA      Commentor: OFFO  
Section #: Figure A-5      Pg #:      Line #:      Code: C  
Comment: This figure differs from that developed during the October meetings regarding the Borrow Area strategy. During those discussion, Ohio EPA expressed a desire to excavate the areas currently excavated as soon as possible in order to initiate restoration/stabilization. Figure A-5 leaves some currently excavated areas unaddressed until Subarea 8. Additionally, it would appear that excavated material from Subarea 2 will need to be hauled through the restored Subarea 1. DOE should provide additional basis for the revised Subareas and

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discuss how Subareas 1 & 2 will be developed/restored.

If you have any questions, please contact Michelle Waller or me.

Sincerely,

*Michelle Waller*  
*for*

Thomas A. Schneider  
Fernald Project Manager  
Office of Federal Facilities Oversight

cc: Jim Saric, U.S. EPA  
Terry Hagen, FDF  
Mark Shupe, HSI GeoTrans  
Francie Hodge, Tetra Tech EM Inc.  
Ruth Vandergrift, ODH